

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO

UNITED STATES OF AMERICA

CIVIL NO. 12-2039 (GAG)(PG)

Plaintiff,

v.

COMMONWEALTH OF PUERTO RICO,
et. al.

Defendants.

EXTENSION OF TIME TO FILE RESPONSE TO TCA'S REPORT

TO THE HONORABLE COURT:

COME NOW the Commonwealth of Puerto Rico and the Puerto Rico Police Bureau, through the undersigned counsel, and respectfully allege and pray as follows:

1. On June 6, 2018, the Technical Compliance Advisor filed his *7th Six Month Report and Tables* in restricted mode. (See Docket 871).
2. Pursuant to Paragraph 252 of the Agreement, PRPB and USDOJ have 30 days to file a response to the TCA's final report. (See Docket 60, ¶252).
3. However, the PRPB is still in the process of analyzing the TCA's Report at Docket No. 871 and needs additional time to submit its response.
4. Moreover, on July 2, 2018, this Honorable Court ordered the Commonwealth to show cause, on or before July 10, as to why Docket No. 871 (*7th Six Month Report and Tables*) should not be unrestricted. (See Docket 902).
5. Considering that the Order of the Court at Docket No. 902 is linked with the response to the TCA's Report, the Commonwealth posits that it would be

adequate to file the response after the Commonwealth has presented the Court ordered motion at Docket 902.

6. Consequently, the Commonwealth requests an extension of time for the PRPB to submit its response to the TCA's Report before July 13, 2018.

WHEREFORE, it is respectfully requested from this Honorable Court to take notice of the above stated and grant this instant motion for an extension of time.

I HEREBY CERTIFY that on this same date, I electronically filed the foregoing with the Clerk of the Court using CM/ECF system which will send notification of such filing to all attorneys of record.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, on July 6, 2018.

WANDA VÁZQUEZ GARCED
Secretary of Justice

WANDYMAR BURGOS VARGAS
Deputy Secretary in Charge of
Litigation
Department of Justice

SUSANA PEÑAGARÍCANO BROWN
Director of Federal Litigation
and Bankruptcy Division

S/JOEL TORRES ORTIZ
Joel Torres Ortiz
U.S.D.C. NO. 302311
Federal Litigation Division
Department of Justice

P.O. Box 9020192
San Juan, P.R., 00902-0192
Tel. (787) 721-2900, ext. 2647,2650,2624,2606
Fax (787) 723-9188
joeltorres@justicia.pr.gov